

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

ANGELA THOMPSON and)	
BRIAN THOMPSON,)	CIVIL COMPLAINT
)	
Plaintiffs,)	
)	CASE NO. 1:18-CV-01836
v.)	
)	
KIMRAIN MARKETING LLC;)	JUDGE DONALD C. NUGENT
KIMBERLY RAINWATER; QUICK)	
RESPONSE ALERT, INC.; HING-)	
TACK CHEN; and YIN FONG)	MAG. JUDGE JONATHAN D.
CHEN as trustee for the YIN-FONG)	GREENBERG
CHEN TRUST and the YIN-FONG)	
CHEN FAMILY TRUST,)	JURY DEMAND
)	
Defendants.)	

**STIPULATION OF PARTIAL DISMISSAL WITH PREJUDICE UNDER
RULE 41(a)(1)(A)(ii) AND NOTICE OF PARTIAL DISMISSAL
WITHOUT PREJUDICE UNDER RULE 41(a)(1)(A)(i)**

Plaintiffs Angela Thompson and Brian Thompson (“Plaintiffs”), on the one hand, and Defendants Quick Response Alert, Inc., Hing-Tack Chen, and Yin-Fong Chen as trustee for the Yin-Fong Chen Trust and the Yin-Fong Chen Family Trust, on the other hand, (the “Stipulating Defendants”) hereby stipulate that the above-captioned case shall be voluntarily dismissed, with prejudice, against the Stipulating Defendants pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Plaintiffs further hereby give notice that the above-captioned case shall be voluntarily dismissed, without prejudice, against Defendants Kimrain Marketing LLC and Kimberly Rainwater, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i).

Dated: October 14, 2019

s/ Geoffrey Parker

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CERTIFICATE OF SERVICE

I, Geoffrey Parker, do hereby certify that this 14th day of October, 2019, I caused the foregoing to be filed via the Court's CM/ECF filing system, which will serve all parties of record.

s/ Geoffrey Parker